

TITLE V APPLICATION REVIEW

Project #: 970294
Deemed Complete: August 29, 1997

Engineer: Dan Hinojosa
Date: 12/07/01

Facility Number: N-2231
Facility Name: Crown Cork & Seal Company, Inc.
Mailing Address: 2638 Nathan Avenue
Modesto, CA. 95354

Contact Name: David Sellhausen
Phone: (209) 544-0390

Responsible Official: E. John Pysar
Title: Vice President

I. PROPOSAL

Crown Cork & Seal Company, Inc. is proposing that an initial Title V permit be issued for its metal can coating facility in Modesto, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Crown Cork & Seal Company, Inc. is located at 2638 Nathan Ave. Modesto, CA. 95354.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. Facility-wide Umbrella General Permit SJV-UM-0-0

The applicant has requested to utilize template No. SJV-UM-0-0, Facility-wide Umbrella, for this facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. Series 2 Metal Can Surface Coating Operations SJV-MC-2-0

The applicant has requested to utilize template No. SJV-MC-2-0, Series 2 Metal Can Surface Coating Operations for its seven (7) High Performance Welding Bodymakers with a Spray/Cure Unit (permit units N-2231-1-1 through N-2231-7-1), and for its Can Coating Line Consisting Of Bodymaker, Spraying Systems, Curing Oven, and Videojet Systems #3 Printer (permit unit N-2231-8-1). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The proposed operating permits are for three piece can side seam spray operations only. The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 39 of the facility-wide requirements (N-2231-0-0).

Conditions 1 through 15 of the requirements for permit unit N-2231-1-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-2-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-3-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-4-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-5-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-6-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-7-1.

Conditions 1 through 15 of the requirements for permit unit N-2231-8-1.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown, (as amended December 17, 1992)¹

District Rule 1160, Emission Statements (as adopted November 18, 1992)¹

District Rule 2010, Permits Required (as amended December 17, 1992)¹

District Rule 2020, Exemptions (as amended July 21, 1994)¹

District Rule 2031, Transfer of Permits (as amended December 17, 1992)¹

District Rule 2040, Applications (as amended December 17, 1992)¹

¹ Conditions from Model Permit Template SJV-UM-0-0 addressed these facility-wide requirements (N-2231-0-0)

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)¹

District Rule 2080, Conditional Approval (as amended December 17, 1992)¹

District Rule 2520, Federally Mandated Operating Permits Sections 5.2, 9.1², 9.4.2², 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, 10.0 and 13.2² (adopted June 15, 1995)¹.

District Rule 4101, Visible Emissions (as amended December 17, 1992)¹

District Rule 4201, Particulate Matter Concentration (as amended December 17, 1992)²

District Rule 4601, Architectural Coatings (as amended December 17, 1992)¹
District Rule 4604, Can and Coil Coating Operations (as amended December 17, 1992)²

District Rules 8020, 8030, and 8060, Fugitive Dust (PM-10) Emissions (as amended April 25, 1996)¹

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos¹

40 CFR Part 82, Subpart F, Stratospheric Ozone¹

Stanislaus County Rule 407, Sulfur Compounds (sulfur emitted from fuel consumption within the curing ovens only)²

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

¹ Conditions from Model Permit Template SJV-UM-0-0 addressed these facility-wide requirements (N-2231-0-0)

² Conditions from Model General Permit Template SJV-MC-2-0 addressed these requirements for permit units N-2231-1-1 through N-2231-8-1.

40 CFR 86, Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)(7)

District Rule 4662, Organic Solvent Degreasing Operations

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rule that is not federally enforceable:

District Rule 4102, Nuisance

For this facility, condition 16 of permit units N-2231-1-1 through N-2231-8-1 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility wide requirements (N-2231-0-0)

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the above noted operating permit as condition numbers 1 through 39 to assure compliance with these requirements.

2. High Performance Welding Bodymaker With A Spray/Cure Unit (7 units equals permit units N-2231-1-1 through N-2231-7-1)

The applicant is proposing to use a general permit template to address federally applicable requirements for its seven Metal Can Surface Coating Operations (PTO N-2231-1-0 through PTO N-2231-7-0). Section IV of template SJV-MC-2-0 includes a

demonstration of compliance for applicable requirements. Template conditions 3 and 5 through 18 (conditions for three-piece can side seam spray operations) have been added to the above noted seven proposed operating permits as condition numbers 1 through 15 to assure compliance with these requirements.

3. Can Coating Line Consisting Of Bodymaker, Spraying Systems, Curing Oven, and Videojet Systems #3 Printer (permit unit N-2231-8-1)

The applicant is proposing to use a general permit template to address federally applicable requirements for its Metal Can Surface Coating Operation (PTO N-2231-8-0). Section IV of template SJV-MC-2-0 includes a demonstration of compliance for applicable requirements. Template conditions 3 and 5 through 18 (conditions for three-piece can side seam spray operations) have been added to permit unit N-2231-8-1 as condition numbers 1 through 15 to assure compliance with these requirements.

- B. Requirements Not Addressed by Model General Permit Templates
 1. New and Modified Stationary Source Review Rule (NSR)
 - a. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-1-0)

PTO N-2231-1-0 was subject to the NSR Rule when permit 6-045-02 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on September 1, 1983. The original ATC is not in the District's files. The missing ATC conditions were therefore assumed to be the same as the conditions contained in the Stanislaus County permit 6-045-02.

- Condition 1 of permit 6-045-02 was not included as a condition of the requirements for permit unit N-2231-1-1. Condition 1 of permit 6-045-02 requires the District to be aware of and approval granted prior to any change in type or chemical formulation, etc. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for such operational changes.

- Condition 2 of permit 6-045-02 is included as condition 4 of the facility wide requirements (N-2231-0-0). Both require that an application for an Authority to Construct must be received and approved by the District prior to the installation of any new processing equipment. Therefore it is unnecessary to add this condition to the requirements for permit unit N-2231-1-1.
- Condition 3 of permit 6-045-02 was not included in the requirements for permit unit N-2231-1-1. Condition 3 of permit 6-045-02 limits the facility to one side seam spray manufactured by Mobil Chemical and to use not more than 2 fluid ounces of thinner per gallon. Conditions 1 and 17 of the requirements for permit unit N-2231-1-1 specify the side seam compounds, VOC content, and Daily Emission Limitation, respectively.

Certain NSR conditions have been updated by PTO N-2231-1-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-1-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-1-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-1-1.
- Condition 4 of the PTO specified the daily emission limitations (DEL) and this condition was included as condition 17 of the requirements for permit unit N-2231-1-1.
- Condition 5 of the PTO specified record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-1-1.
- Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by condition 10 of the requirements for permit unit N-2231-1-1 which requires records to be retained for five years.

b. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-2-0)

PTO N-2231-2-0 was subject to the NSR rule when permit 6-045-03 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on September 1, 1983. The original ATC is not in the District's files. The missing ATC conditions were therefore assumed to be the same as the conditions contained in the Stanislaus County permit 6-045-03.

- Condition 1 of permit 6-045-03 was not included as a condition of the requirements for permit unit N-2231-2-1. Condition 1 of permit 6-045-03 requires the District to be aware of and approval granted prior to any change in type or chemical formulation, etc. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for such operational changes.
- Condition 2 of permit 6-045-03 is included as condition 4 of the facility wide requirements (N-2231-0-0). Both require that an application for an Authority to Construct must be received and approved by the District prior to the installation of any new processing equipment. Therefore it is unnecessary to add this condition to the requirements for permit unit N-2231-2-1.
- Condition 3 of permit 6-045-03 was not included in the requirements for permit unit N-2231-2-1. Condition 3 of permit 6-045-03 limits the facility to one side seam spray manufactured by Mobil Chemical and to use not more than 2 fluid ounces of thinner per gallon. Conditions 1 and 17 of the requirements for permit unit N-2231-2-1 specify the side seam compounds, VOC content, and Daily Emission Limitation, respectively.

Certain NSR conditions have been updated by PTO N-2231-2-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-2-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-

2231-2-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-2-1.

- Condition 4 of the PTO specified the daily emission limitations (DEL) and this condition was included as condition 17 of the requirements for permit unit N-2231-2-1.
- Condition 5 of the PTO specified record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-2-1.
- Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-2-1.

c. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-3-0)

PTO N-2231-3-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC 6-045-12 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on February 6, 1985.

- Condition 1 of ATC 6-045-12 was not included in the requirements for permit unit N-2231-3-1. Condition 1 of ATC 6-045-12 limits the facility to one side seam spray manufactured by Mobil Chemical. This requirement is too restrictive and it is not in the current PTO. The current PTO limits VOC emissions using a daily emission limitation which is discussed below.
- Condition 2 of the ATC requires that any changes in the side seam spray or cleanup solvent type or amount used must receive prior District approval. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for operational changes. Also, conditions 1 and 17 of the requirements for permit unit N-2231-3-1 satisfactorily restrict the VOC content of the side seam spray and the DEL, respectively.
- Condition 3 of ATC 6-045-12 was not included in the requirements for permit unit N-2231-3-1. Condition 3 of ATC 6-045-12 limits the facility to Mobil Chemical XP-2310 coating without additional solvent as thinner.

Conditions 1 and 17 of the requirements for permit unit N-2231-3-1 specify the side seam spray VOC content and DEL, respectively.

Certain NSR conditions have been updated by PTO N-2231-3-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-3-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
 - Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-3-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-3-1.
 - Condition 4 of the PTO specified the daily emission limitations (DEL) and this condition was included as condition 17 of the requirements for permit unit N-2231-3-1.
 - Condition 5 of the PTO specified record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-3-1.
 - Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-3-1.
- d. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-4-0)

PTO N-2231-4-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC 6-045-14 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on August 19, 1985.

- Condition 1 of ATC 6-045-14 was not included in the requirements for permit unit N-2231-4-1. Condition 1 of ATC 6-045-14 limits the facility to one side seam spray manufactured by Mobil Chemical. This requirement is too restrictive and it is not in the current PTO. The current PTO limits

VOC emissions using a daily emission limitation which is discussed below.

- Condition 2 of ATC 6-045-14 requires that any changes in the side seam spray or cleanup solvent type or amount used must receive prior District approval. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for operational changes. Also, conditions 1 and 17 of the requirements for permit unit N-2231-4-1 satisfactorily restrict the VOC content of the side seam spray and the DEL, respectively.
- Condition 3 of ATC 6-045-14 was not included in the requirements for permit unit N-2231-4-1. Condition 3 of ATC 6-045-14 limits the facility to Valspar XP-2365 coating without additional solvent as thinner. Conditions 1 and 17 of the requirements for permit unit N-2231-4-1 specify the side seam spray VOC content and DEL, respectively.

Certain NSR conditions have been updated by PTO N-2231-4-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-4-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-4-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-4-1.
- Condition 4 of the PTO specified the daily emission limitations (DEL) and this condition was included as condition 17 of the requirements for permit unit N-2231-4-1.
- Condition 5 of the PTO specified record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-4-1.
- Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which

requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-4-1.

e. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-5-0)

PTO N-2231-5-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC 6-045-15 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on April 7, 1986.

- Condition 1 of ATC 6-045-15 was not included in the requirements for permit unit N-2231-5-1. Condition 1 of ATC 6-045-15 limits the facility to one side seam spray manufactured by Mobil Chemical. This requirement is too restrictive and it is not in the current PTO. The current PTO limits VOC emissions using a daily emission limitation which is discussed below.
- Condition 2 of the ATC was not included in the requirements for permit unit N-2231-5-1. This condition requires that cleanup solvent for this line shall be LT 74-MEK and the usage rate shall not exceed 0.5 gallons/day.
- Condition 3 of the ATC requires that any changes in the side seam spray or cleanup solvent type or amount used may receive prior District approval. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for operational changes. Also, conditions 1 and 17 of the requirements for permit unit N-2231-5-1 satisfactory restrict the VOC content of the side seam spray and the DEL, respectively.

Certain NSR conditions have been updated by PTO N-2231-5-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-5-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-5-1 fully address the record keeping requirements of Rule 4604.

Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-5-1.

- Condition 4 from the PTO was included as condition 17 of the requirements from permit unit N-2231-5-1.
 - Condition 5 of the PTO specified record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-5-1.
 - Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-5-1.
- f. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-6-0)

PTO N-2231-6-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC 6-045-13 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on February 6, 1985.

- Condition 1 of ATC 6-045-13 was not included in the requirements for permit unit N-2231-6-1. Condition 1 of ATC 6-045-13 limits the facility to one side seam spray manufactured by Mobil Chemical. This requirement is too restrictive and it is not in the current PTO. The current PTO limits VOC emissions using a daily emission limitation which is discussed below.
- Condition 2 of ATC 6-045-13 requires that any changes in the side seam spray or cleanup solvent type or amount used must receive prior District approval. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for operational changes. Also, conditions 1 and 17 of the requirements for permit unit N-2231-6-1 satisfactorily restrict the VOC content of the side seam spray and the DEL, respectively.
- Condition 3 of ATC 6-045-13 was not included in the requirements for permit unit N-2231-3-1. Condition 3 of ATC 6-045-13 limits the facility to Mobil Chemical XP-2310 coating without additional solvent as thinner. Conditions 1 and 17 of the requirements for permit unit N-2231-6-1 specify the side seam spray VOC content and DEL, respectively.

Certain NSR conditions have been updated by PTO N-2231-6-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-6-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
 - Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-6-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-6-1.
 - Condition 4 from the PTO was included as condition 17 of the requirements from permit unit N-2231-6-1.
 - Condition 5 of the PTO specified detailed record keeping requirements, and is included as condition 3 of the requirements for permit unit N-2231-6-1.
 - Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-6-1.
- g. High Performance Welding Bodymaker With A Spray/Cure Unit (PTO N-2231-7-0)

PTO N-2231-7-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC 6-045-16 was issued by the Stanislaus County Department of Environmental Resources Air Pollution Control District on January 27, 1987.

- Condition 1 of ATC 6-045-16 requires the District to be aware of and approval granted prior to any change in chemical formulation or amount of side seam spray. This condition is not necessary because condition 4 of the facility-wide requirements (N-2231-0-0) requires an ATC for such operational changes.

- Condition 2 of ATC 6-045-16 stipulated a VOC daily emission limit of 250 lb/day. Subsequent PTO condition 4 revised this limit upwards to 308 lb/day, and is included as condition 17 of the requirements for permit unit N-2231-7-1. The VOC limit was revised to match the 551 g/L limit originally cited by reference when the manufacturer of the side seam spray was specified.
- Condition 3 of ATC 6-045-16 specified detailed record keeping requirements, and is included in condition 3 of the requirements for permit unit N-2231-7-1.

Certain NSR conditions have been updated by PTO N-2231-7-0. These are addressed as follows:

- Condition 1 of the PTO is included as permit condition 16 of the requirements for permit unit N-2231-7-1. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 of the PTO requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-7-1 fully address the record keeping requirements of Rule 4604. Therefore condition 2 of the PTO was not added to the requirements for permit unit N-2231-6-1.
- Condition 6 of the PTO required that records be retained for a period of two years only. This was replaced by a more stringent condition which requires records to be retained for five years, and is included as condition 10 of the requirements for permit unit N-2231-7-1.

- h. Interior & Exterior side seam can coating line consisting of a bodymaker, spraying systems spray applicators, curing oven, and videojet systems printer. (PTO N-2231-8-0)

PTO N-2231-8-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC). ATC N-2231-8-0 was issued by the San Joaquin Valley Unified Air Pollution Control District on November 17, 1995.

- Condition 1 of the ATC is redundant with the facility wide requirement (S-7231-0-0) condition 22. Both conditions require an opacity limit of 20% or Ringleman 1. Therefore condition 1 of the PTO was not added to the requirements for permit unit N-2231-1-1.
- Condition 2 of ATC N-2231-8-0 is included as condition 16 of the requirements for permit unit N-2231-8-1. This condition is not federally enforceable because it is based on the public nuisance requirement of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 3 of the ATC requires that the coating operation comply with Rule 4604. Conditions 1, 2, 3 and 8 of the requirements for permit unit N-2231-8-1 fully address the requirements of Rule 4604. Therefore, condition 3 of the ATC was not added to the requirements for permit unit N-2231-8-1.
- Condition 4 of the ATC requires that records be kept in accordance with Rule 4604. Conditions 2, 3 and 10 of the requirements for permit unit N-2231-8-1 fully address the record keeping requirements of Rule 4604. Therefore, condition 4 of the ATC was not added to the requirements for permit unit N-2231-8-1.
- Condition 5 of the ATC requires that records be retained for a period of two years only. This condition was replaced by condition 10 of the requirements for permit unit N-2231-8-1.
- Condition 6 of ATC N-2231-8-0 is included as condition 21 of the requirements for permit unit N-2231-8-1.
- Condition 7 of ATC N-2231-8-0 is included as condition 17 of the requirements for permit unit N-2231-8-1.

- Condition 8 of ATC N-2231-8-0 is included as condition 18 of the requirements for permit unit N-2231-8-1.
 - Condition 9 of ATC N-2231-8-0 is included as condition 19 of the requirements for permit unit N-2231-8-1.
 - Condition 10 of ATC N-2231-8-0 is included as condition 6 of the requirements for permit unit N-2231-8-1.
 - Condition 11 of ATC N-2231-8-0 is included as condition 20 of the requirements for permit unit N-2231-8-1.
4. 40 CFR 68, Risk Management Programs
- a. Facility wide requirements (N-2231-0-0)

This rule sets forth planning and reporting requirements for preventing possible accidental release of regulated substances or extremely hazardous substances. This includes the preparation and implementation of a Risk Management Plan by June 21, 1999, if the facility stores substances listed in 40 CFR 86.130 in quantities above threshold levels. Condition 41 of the facility wide requirements (N-2231-0-0) assures compliance with this requirement.

3. District Rule 4662, Organic Solvent Degreasing Operations

The purpose of this rule is to limit VOC emissions from organic solvent degreasing operations was not specifically exempted. The rule includes general operating and control equipment requirements for cold cleaners, open-top vapor degreasers, and conveyorized solvent degreasers. See the facility-wide requirements (N-2231-0-0), condition 40.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By submitting model general permit template SJV-UM-0-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as condition 38 and 39 of the facility wide requirements (N-2231-0-0).

By submitting model general permit template SJV-MC-2-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 12, 13, 14, and 15 of the requirements for permit units N-2231-1-1, N-2231-2-1, N-2231-3-1, N-2231-4-1, N-2231-5-1, N-2231-6-1, N-2231-7-1, and N-2231-8-1.

XI. PERMIT CONDITIONS

See attached draft facility wide requirements (N-2231-0-0) and permit units N-2231-1-1 through N-2231-8-1 on the following pages.

XII. EPA AND PUBLIC COMMENTS

See Attachment D

ATTACHMENT A

DETAILED FACILITY PRINTOUT

ATTACHMENT B

INSIGNIFICANT ACTIVITIES OR EQUIPMENT

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities.

Exemption Category	Rule 2020 Citation
Use of less than 2 gal/day of graphic arts materials.	5.4
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1
Space heating equipment other than boilers.	5.1.4
Brazing, soldering, or welding equipment.	5.10.1
Containers with a capacity \leq 250 gallons used to store organic material where the actual storage temperature \leq 150 F.	5.7.4
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4
Equipment used to apply architectural coatings.	5.9.1
Unheated, non-conveyorized degreasers \leq 10 ft ² open area; using solvents with initial boiling point \geq 248 F; and \leq 25 gal/yr evaporative losses.	5.9.2
Non-structural repairs and maintenance to permitted equipment.	4.2.6
Emissions less than 2 lb/day from units not included above.	4.2.1
Pits and ponds as described in Rule 1020.	5.10.6

ATTACHMENT C

AUTHORITIES TO CONSTRUCT (ATCs) AND PERMITS TO OPERATE (PTOs)

Attachment D

EPA/Facility Comments and District Responses

A. EPA COMMENTS/ DISTRICT RESPONSE

The United States Environmental Protection Agency's comments regarding the proposed Title V Operating Permit for Crown Cork & Seal Company, Inc. is summarized below, and is followed by the District's response. A copy of the EPA's letter dated January 30, 1998 is available at the District.

1. EPA OBJECTION

Authority to Construct VOC Limits

The proposed permit does not include relevant conditions from Stanislaus County ATC permits 6-045-14, 6-045-15, and 6-045-16 for Performance Welding Bodymaker units N-2231-4-1, N-2231-5-1, and N-2231-7-1. These omitted conditions restrict the spray coating to one brand, Valspar XP2365, thereby limiting the VOC content of side-seam spray coatings to 551 g/L of VOC. This limit is more stringent than the proposed Title V permit's limit of 660 g/L of VOC. The ATC permits also generally prohibit the addition of thinner to the coating. The District must either 1) show that these limits were revised consistent with the applicable NSR requirements for the source or 2) include an equivalent VOC limit in the final title V permit. These concerns also apply to the ATC limits for Units 1, 2, 3, and 6.

DISTRICT RESPONSE

The original ATC specified a specific coating with 551 gm/L to assure compliance with Stanislaus County Rule 409.6 Can and Coil Coating Operations. These conditions were not based on a BACT determination or NSR requirements at that time. Compliance with the prohibitory limits of District Rule 4604 (660 gm/VOC/l) adequately demonstrates compliance with the SIP approved requirements. Therefore no additional changes are necessary for this permit.

B. FACILITY COMMENTS/ DISTRICT RESPONSE

Crown Cork & Seal Company, Inc. comments regarding its proposed Title V permit is summarized below, and is followed by the District's response. A copy of Crown Cork & Seal Company, Inc. letter dated received on February 9, 1998 is available at the District.

1. FACILITY COMMENT

Revise the facility's mailing address, contact name, and contact telephone number on page one of the Title V Application Review.

DISTRICT RESPONSE

Revise mailing address to 2638 Nathan Avenue, Modesto, CA. 95354. Revise contact name to David Sellhausen, telephone (209) 544-0390.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

CROWN CORK & SEAL COMPANY, INC.

FINAL ENGINEERING EVALUATION TABLE OF CONTENTS

SECTION	PAGE
I. PROPOSAL	1
II. FACILITY LOCATION	1
III. EQUIPMENT LISTING	1
IV. GENERAL PERMIT TEMPLATE USAGE	2
V. SCOPE OF EPA AND PUBLIC REVIEW	2
VI. APPLICABLE REQUIREMENTS ADDRESSED BY A GENERAL PERMIT TEMPLATE	3
VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY A GENERAL PERMIT TEMPLATE	4
VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE	5
IX. COMPLIANCE	5
X. PERMIT SHIELD	17
XI. PERMIT CONDITIONS	18
XII. EPA and PUBLIC COMMENTS	18
ATTACHMENT A - DETAILED FACILITY PRINTOUT	
ATTACHMENT B - INSIGNIFICANT ACTIVITIES OR EQUIPMENT	
ATTACHMENT C - AJVUAPCD PERMITS	
ATTACHMENT D - EPA and PUBLIC COMMENTS	

Crown Cork & Seal Company, Inc.
Facility #: N-2231
Project #: 970294

12/07/01

**San Joaquin Valley Unified Air Pollution Control District
FINAL ENGINEERING EVALUATION**

**Facility #N-2231
Crown Cork & Seal Company, Inc.**

PREPARED BY:

**Dan Hinojosa
Air Quality Engineer**

REVIEWED BY:

**Rick McVaigh
Permit Services Manager**

APPROVED BY:

**Sayed Sadredin
Director of Permit Services**

FINAL DECISION DATE:
